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7 Attorneys for Defendant
8 ROCKY MOUNTAIN HOSPITAL AND
9 MEDICAL SERVICE, INC. DBA ANTHEM
10 BLUE CROSS AND BLUE SHIELD erroneously
sued herein as BLUE CROSS OF COLORADO, a
business organization, form unknown

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13
14 LAS VEGAS REGIONAL SURGERY)
15 CENTER, L.P., A Nevada Limited)
Partnership,)

16 Plaintiff,)

17 vs.)

18 BLUE CROSS OF COLORADO, a)
19 business organization, form unknown, and)
DOES 1 - 10,)

20 Defendant.)
21)
22)
23)

Case No. 2:18-cv-00093-RFB-NJK

**STIPULATION TO EXTEND
TIME FOR ROCKY MOUNTAIN
HOSPITAL AND MEDICAL
SERVICE, INC. DBA ANTHEM
BLUE CROSS AND BLUE SHIELD
ERRONEOUSLY SUED HEREIN
AS BLUE CROSS OF
COLORADO, A BUSINESS
ORGANIZATION, FORM
UNKNOWN TO ANSWER OR
OTHERWISE RESPOND TO THE
COMPLAINT [First Request]**

24 WHEREAS, Defendant ROCKY MOUNTAIN HOSPITAL AND MEDICAL
25 SERVICE, INC. DBA ANTHEM BLUE CROSS AND BLUE SHIELD erroneously
26 sued herein as BLUE CROSS OF COLORADO, a business organization, form
27 unknown ("ROCKY MOUNTAIN") was served with the Complaint in this action by
28 Plaintiff LAS VEGAS REGIONAL SURGERY CENTER, L.P., A Nevada Limited

1 Partnership ("Plaintiff") on December 20, 2017, which was filed in the State of
2 Nevada District Court;

3 WHEREAS, on January 17, 2018, ROCKY MOUNTAIN removed the action
4 to the United States District Court for the District of Nevada;

5 WHEREAS, the deadline for ROCKY MOUNTAIN to respond to the
6 Complaint is presently January 24, 2018;

7 WHEREAS, ROCKY MOUNTAIN's counsel requires time to review and
8 assess the file in order to prepare an adequate response to the Complaint;

9 WHEREAS, for good cause and pursuant to Local Rule IA 6-1, the parties
10 wish to extend the time within which a responsive pleading to the Complaint must be
11 filed and served by ROCKY MOUNTAIN by thirty (30) days, to February 23, 2018;

12 WHEREAS, this is the first stipulation for extension of time to file a
13 responsive pleading to the Complaint;

14 IT IS HEREBY STIPULATED by and between Plaintiff and ROCKY
15 MOUNTAIN, by and through their respective attorneys of record, that the time
16 within which a responsive pleading to Plaintiff's Complaint must be filed and served
17 by ROCKY MOUNTAIN is extended to February 23, 2018.

18 **IT IS SO STIPULATED.**

19
20 Dated January 22, 2018

David J. Merrill
DAVID J. MERRILL, P.C

21
22
23 By: /s/ David J. Merrill
24 David J. Merrill
25 Attorneys for Plaintiff
26 LAS VEGAS REGIONAL
27 SURGERY CENTER. L.P., A
28 Nevada Limited Partnership

1 Dated: January 22, 2018

Anna Maria Martin
MESERVE, MUMPER & HUGHES LLP

2
3 By: /s/ Anna Maria Martin

4 Anna Maria Martin
5 Attorneys for Defendant
6 ROCKY MOUNTAIN HOSPITAL
7 AND MEDICAL SERVICE, INC.
8 DBA ANTHEM BLUE CROSS
9 AND BLUE SHIELD

10 **ECF Certification**

11 The filing attorney attests that she has obtained concurrence regarding the
12 filing of this document from the signatories to this document.
13

14 **IT IS SO ORDERED:**

15 Dated: January 23, 2018

16 
UNITED STATES MAGISTRATE JUDGE